

Re: WGSL, CQA Report Documenting Repairs to the Final Section of Cell E6 Liner

Stephen Tyahla to: Whelan, Joseph

04/06/2011 02:44 PM

"lene.ichinotsubo@doh.hawaii.gov",

"Steven.chang@doh.hawaii.gov", "Miyashiro, Thomas", Cc: alec.wong, stuart.yamada, Steve Armann, Arlene Kabei, Rich Vaille, David Wampler, Andrew Helmlinger, Bret

Moxley

From: Stephen Tyahla/R9/USEPA/US

To: "Whelan, Joseph" <JWhelan1@wm.com>

Cc: "lene.ichinotsubo@doh.hawaii.gov" <lene.ichinotsubo@doh.hawaii.gov>,

"Steven.chang@doh.hawaii.gov" <Steven.chang@doh.hawaii.gov>, "Miyashiro, Thomas" <thomas.miyashiro@doh.hawaii.gov>, alec.wong@doh.hawaii.gov, stuart.yamada@doh.hawaii.gov, Steve Armann/R9/USEPA/US@EPA, Arlene

Kabei/R9/USEPA/US@EPA, Rich Vaille/R9/USEPA/US@EPA, David

Wampler/R9/USEPA/US@EPA, Andrew Helmlinger/R9/USEPA/US@EPA, Bret

Moxley/R9/USEPA/US@EPA

Joe,

We have reviewed and approve the subject CQA report (AECOM letter of 4 April 2011, Subject: Liner Damage Assessment, Repair, and Construction Quality Assurance Report for Cell E6 Sideslope, Waimanalo Gulch Sanitary Landfill, Kapolei, HI). EPA concurs that with this approval, Waste Management of Hawaii, Inc. ("WMH") has restored the liner system integrity as required by paragraph 19.f. of our Administrative Order on Consent ("Order") of 25 January 2011.

[One minor error on the report; Figure 1 referred to the Southern Sideslope Liner Area as being part of the "(Current Repair Area)" when in fact AECOM's CQA report of 1 April 2011, as is noted in the text, had included documentation related to repair of this area.]

The attached Order deliverables tracking spreadsheet has been updated to reflect this approval and prior approvals and is provided for your convenience.

Thanks,

Stephen F. Tyahla, P.E.,CHMM
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AOC task due dates-WGSL.xls

"Whelan, Joseph" Please find the C... 04/04/2011 05:54:52 PM Greetings all.

From: "Whelan, Joseph" <JWhelan1@wm.com>

"Steven.chang@doh.hawaii.gov" < Steven.chang@doh.hawaii.gov>, To:

"lene.ichinotsubo@doh.hawaii.gov" <lene.ichinotsubo@doh.hawaii.gov>, "Miyashiro,

Thomas" <thomas.miyashiro@doh.hawaii.gov>, Stephen Tyahla/R9/USEPA/US@EPA

Date: 04/04/2011 05:54 PM

Subject: WGSL, CQA Report Documenting Repairs to the Final Section of Cell E6 Liner

Greetings all.

Please find the CQA report documenting the liner repairs related to the storm damage located within the northwest portion of Cell E6. This submission documents the final section of the Cell E6 liner repairs. We would appreciate your timely review and approval of this report. Thank you in advance for your assistance with this most important project.

Best regards,

Joe

Joe Whelan

General Manager Waste Management of Hawaii 808-668-2985, ext. 15 Office 808-668-1366 Fax 808-479-4610 Mobile

Waste Management's landfills provide over 17,000 acres of protected land for wildlife habitats and 15 landfills are certified by the Wildlife Habitat Council.

Waste Management recycles enough paper every year to save 41 million trees. Please recycle any printed emails. [attachment "Ltr Rpt Cell E6 West Slope Repair 040411.pdf" deleted by Stephen Tyahla/R9/USEPA/USI

Deliverable or Task (AOC ¹ paragraph) Revision date: 04/06/2011	Due Date ³	Date Submitted or Completed by WMH	Date Response issued by EPA	Date Resubmission due to EPA (if required, 15 days from EPA response) ⁴	Date Resubmitted by WMH	Date approved by EPA
EFFECTIVE DATE OF AOC = 25-Jan-11		Ī	İ	<u> </u>	İ	i
Ensure the termination of discharges of liquid originating from cell #E6 to the to the Pacific Ocean, except as in compliance with any applicable permit, immediate/ongoing (19.c.)	25-Jan-11	Ongoing	NA ²	NA	NA	NA
Respondent shall not operate cell #E6 without further approval from EPA (19.g.)	25-Jan-11	27-Jan-11	28-Jan-11	NA	NA	28-Jan-11
Submit Daily Progress Reports (via e-mail), starting 2 days after Effective Date (i.e., 27-Jan-11) (24.a.)	27-Jan-11	27-Jan-11	NA	NA.	NA	NA
Condition 1) of EPA 28-Jan-11 Approval to Operate Cell #E6: Waste is to be disposed only within the footprint designated on your hand-annotated drawing submitted with your Petition for Re-Opening.	28-Jan-11	NA	NA	NA	NA	NA
Condition 2) of EPA 28-Jan-11 Approval to Operate Cell #E6: As recommended by AECOM, waste placement operations should be kept a minimum of 50 feet away from the damaged western edge of E6	28-Jan-11	NA.	NA.	NA.	NA	NA.
Continue to collect and transport to a local treatment facility the waters at the Site retained behind the temporary earthen berm in cell #E6. Provide a written description of the collection and treatment activities, the current permitting and the chemical parameters of the liquids, and transportation methods to the local treatment facility, due within 7 days of Effective Date (19.d.)	1-Feb-11	1-Feb-11	10-Feb-11	25-Feb-11	25-Feb-11	4-Mar-11
Provide to EPA and DOH a Work Plan and schedule, subject to modification based on further field analysis, for managing the hydraulic head between cell #E6 and the fluids outside of cell #E6 in order to maintain the integrity of the cell liner as the fluids are drawn down and the leachate collection system is returned to normal functions, due within 7 days of Effective Date (19.e.)	1-Feb-11	1-Feb-11	10-Feb-11	NA	NA	10-Feb-11
Provide to EPA and DOH a Work Plan and schedule to restore the sediment basin system to its intended capacity and function, due within 7 days of the Effective Date (19.h.)	1-Feb-11	1-Feb-11	10-Feb-11	25-Feb-11	25-Feb-11	4-Mar-11
Provide to EPA and DOH a Work Plan and schedule for ongoing daily beach assessment and recovery of Waste Material released from the WGSL, due within 7 days of the Effective Date (19.i.)	1-Feb-11	1-Feb-11	10-Feb-11	25-Feb-11	25-Feb-11	4-Mar-11
Submit Site Health and Safety Plan, due within 7 days of Effective Date (21.)	1-Feb-11	1-Feb-11	10-Feb-11	NA.	NA	Accepted 10 Feb 11
Maintain specified comprehensive general liability insurance and automobile insurance with limits of \$2,000,000, combined single limit; provide certificates of insurance to EPA within 7 days of Effective Date (75.)	1-Feb-11	26-Jan-11	NA	NA	NA	NA
Condition 4) of EPA 28-Jan-11 Approval to Operate Cell #E6: Submit a revised stormwater contingency plan by February 1, 2011.	1-Feb-11	1-Feb-11	10-Feb-11	25-Feb-11	25-Feb-11	4-Mar-11
Analysis by a qualified Civil or Geotechnical Engineer of the stability and suitability of the temporary earthen berm, due within 10 days of the Effective Date (19.a.)	4-Feb-11	4-Feb-11	4-Apr-11	NA	NA	4-Apr-11

File Name: "6790730.xls Page 1 of 2

Deliverable or Task (AOC ¹ paragraph) Revision date: 04/06/2011	Due Date ³	Date Submitted or Completed by WMH	Date Response issued by EPA	Date Resubmission due to EPA (if required, 15 days from EPA response) ⁴	Date Resubmitted by WMH	Date approved by EPA
Condition 3) of EPA 28-Jan-11 Approval to Operate Cell #E6: The western edge of Cell E6 should be repaired as expeditiously as practicable, with plan and schedule for repair provided to EPA within one week (from date of EPA approval, thus due 4-Feb-11)	4-Feb-11	4-Feb-11	10-Feb-11	NA	NA	10-Feb-11
Provide to EPA and DOH a Work Plan and schedule to evaluate and demonstrate or restore the integrity of the liner system in cell #E6, due within 14 days of the Effective Date (19.f.)	8-Feb-11	4-Feb-11	10-Feb-11	NA.	NA	10-Feb-11
Complete construction of a functional storm water diversion structure on the west side above cell #E6, due within 21 days of the Effective Date (19.b.)	15-Feb-11	15-Feb-11	16-Feb-11	NA NA	NA	16-Feb-11
Submit Post-Assessment letter report documenting the results of the piezometric assessment (19.e.)	7-Mar-11	25-Feb-11	3-Mar-11	NA	NA_	4-Mar-11
Condition 5) of EPA 28-Jan-11 Approval to Operate Cell #E6: No later than fifteen (45-25 days [Extension granted to WMH by EPA on 2/10/11]) after the completion of a functional storm water division structure (Western Drainage System) as required in 19.b. of EPA's Order, WM must revise and submit to EPA its SWPCP to incorporate the functional Western Drainage System and all ancillary storm water connections into its revised SWPCP consistent with the requirements of its storm water general permit. Complete restoration of the sediment basin system to its intended capacity and function by implementing the approved Work Plan (19.h.)	12-Mar-11 15-May-11	11-Mar-11	15-Mar-11	2-May-11		
Complete liner repairs in accordance with the EPA-approved "Waimanalo Gulch Landfill Workplan for Liner Evaluation and Repair," including submission of the Construction Quality Assurance ("CQA") report(s) (19.f)	15-May-11	4-Apr-11	6-Apr-11	NA	NA	6-Apr-11
In event of emergency situation that causes or threatens a release of Waste Material form the Site: Immediately take all appropriate actions, and Immediately notify the OSC or the RAO; if neither available, notify EPA's Regional Duty Officer (38.)	As Required					
Submit Final Report, due 60 days after completing all Work (25.)	TBD (project 14 July 2011)					

NOTES:

1- "AOC" refers to U.S. EPA Region 9's Administrative Order on Consent for Removal Action, CERCLA Docket No. 09-2011 0007 and RCRA Docket No. 7003-09-2011-0001 of 25 January 2011.

- 2- "NA" means Not Applicable.
- 3- Italicized dates are either as proposed by EPA in comments back to WMH, or projected (e.g.,
- 4- Revised SWPCP to be submitted by 02 May 2011 as agreed on 22 March 2011.

File Name: ~6790730.xls